

1 LEWIS ROCA ROTHGERBER CHRISTIE LLP

John C. Gray (Bar No. 028454)

2 Alexander R. LaCroix (Bar No. 030166)

201 East Washington Street, Suite 1200

3 Phoenix, AZ 85004

Telephone: (602) 262-5311

4 Facsimile: (602) 262-5747

Email: jgray@lewisroca.com

5 alacroix@lewisroca.com

6 *Specially Appearing for Defendant*  
7 *Manifold Finance, Inc.*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF ARIZONA**

10 ENS Labs, Ltd. *et al.*,

11 Plaintiffs,

12 v.

13 GoDaddy, Inc. *et al.*,

14 Defendants.

Case No. 2:22-cv-01494-JJT

**JOINDER OF SPECIALLY  
APPEARING DEFENDANT  
MANIFOLD FINANCE, INC. IN  
DYNADOT LLC'S RESPONSE IN  
OBJECTION TO PLAINTIFFS'  
MOTION TO ENFORCE  
PRELIMINARY INJUNCTION AND  
REQUEST TO CLARIFY OR AMEND  
THE PRELIMINARY INJUNCTION**

(Assigned to the Hon. John J. Tuchi)

1 Subject to and without waiving its jurisdictional defenses, Defendant Manifold  
 2 Finance, Inc. (“Manifold”), specially appears to join in Defendant Dynadot LLC’s  
 3 Response In Objection To Plaintiffs’ Motion To Enforce Preliminary Injunction And  
 4 Request To Clarify Or Amend The Preliminary Injunction (“Dynadot’s Response”)  
 5 [Dkt. 73].

6 As noted in Dynadot’s Response, Manifold filed, on October 18, 2022, a Motion To  
 7 Dismiss First Amended Complaint And To Vacate Preliminary Injunction For Lack Of  
 8 Personal Jurisdiction [Dkt. 37], which remains pending. As explained in that motion, the  
 9 Court lacks personal jurisdiction over Manifold, such that Manifold must be dismissed  
 10 from this action, and the previously entered injunction [Dkt. 19] must be vacated.

11 Accordingly, and for the other reasons set forth in Dynadot’s Response, Plaintiffs’  
 12 Motion To Enforce Preliminary Injunction [Dkt. 65] must also be denied.<sup>1</sup>

13  
 14 Dated: May 15, 2023

Lewis Roca Rothgerber Christie LLP

15  
 16 By: 

John C. Gray  
 Counsel for Defendant  
 Manifold Finance, Inc.

17  
 18  
 19  
 20  
 21 <sup>1</sup> In reality, Plaintiffs’ motion is not really a motion to *enforce* the Injunction but rather to  
 22 *expand* the scope of the Injunction to permit Plaintiffs to transfer the internet domain name  
 that is the subject of this action to a different registrar, potentially beyond the jurisdiction  
 of this Court. (See Dynadot’s Response, p. 2.)